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September 4, 2024

Acting Commissioner Willow Baer

OPWDD

44 Holland Avenue

Albany, NY 12229

**Advocacy for Increased Reimbursement Rates and Expanded Services for Community Habilitation**

Community Habilitation plays a vital role in allowing individuals to remain in their homes and integrate within their communities, thereby preventing the need for certified residential placements. Unfortunately, over recent years, a significant decline in the number of individuals served by providers has been observed, primarily due to inadequate reimbursement rates.

A survey conducted in Fall 2023, with responses from 50 provider agencies statewide, underscores the critical need for advocacy in Community Habilitation. Many agencies are experiencing extensive waitlists, to the extent that they have ceased accepting new referrals. Currently, over 700 individuals are awaiting services, with many others in a queue to join the waitlist.

To address this urgent issue and ensure individuals can continue to live successfully within their communities, the Developmental Disabilities Alliance of Western New York (DDAWNY) requests a revision of the regional rates for Community Habilitation. Data from the 2023 CFR reports provided by Western New York (WNY) provider agencies indicate that the current reimbursement rates result in operational losses for delivering these essential services. Additionally, the OPWDD Data Book released in June 2023 reveals that the state reimburses itself at a rate that is 372% higher than what is paid to DDAWNY providers. Such a disparity raises concerns about the sustainability of these services under the current funding structure.

Furthermore, many crucial services performed by providers, which are essential for effective Community Habilitation, are not billable. These include travel to provide services, communication with landlords, medical providers, and other community-based organizations, as well as documentation of services. Addressing these non-billable activities in the reimbursement structure would significantly alleviate the financial burden on providers. The recent expansion of allowable services through Supported Employment ADM has demonstrated that such adjustments not only mitigate financial strain but also enable providers to offer competitive wages to Direct Care staff. Fair compensation is vital for building provider capacity and meeting the needs of those currently on waitlists.

DDAWNY is requesting a 44% increase in the regional rates for Community Habilitation to support individuals in their homes and reduce the need for more costly, less independent services. Additionally, we seek an expansion of billable items to include:

* Planning and management of all allowable Community Habilitation Services
* Staff travel time
* Rounding units of service for billing
* Billing for Community Habilitation Services in the absence of the individual, including:
* Development of integrated living options
* Meetings and communications related to housing, food security, and transportation
* Meetings and communications addressing health and healthcare
* Meetings and communications for benefits support and development
* Meetings and communications with staff providing other approved services impacting Community Habilitation goals

By collaborating and committing to these proposed adjustments, we can enhance Community Habilitation services similarly to the successful initiatives in supported employment ADM and rate increases. Investing in Community Habilitation is crucial to preventing greater costs within our overall healthcare system.

We appreciate your time and consideration of this matter and look forward to a positive response. Together, we can ensure that rates and regulations support a sustainable future for Community Habilitation services.

Respectfully,



Christine Lalka and Michelle Zangerle

Co-Chairs of Community Habilitation and Respite DDAWNY Committee